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|--------|---|--|
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| 7      | Attorneys for Defendants  |  |
| 8      | UNITED STATES DISTRICT COURT  |  |
| 9      |   |  |
| 10     | NORTHERN DISTRICT OF CALIFORNIA   |  |
| 11     |   | ND DIVISION  |
| 12     | JIANYE LIU, et al.,   | Case No. 4:24-cv-08875 YGR   |
| 13     | Plaintiffs,   |  |
| 14     | V.  | STIPULATION TO STAY PROCEEDINGS;<br><del>{PROPOSED}</del> ORDER; AS AMENDED BY |
| 15     | JAMES WYROUGH, in his official capacity, Director of the San Jose Field Office, <i>et al.</i> ,   | COURT  |
| 16     | Defendants.   |  |
| 17     | The mark of the second of the |  |
| 18     | The parties, through their attorneys, hereby stipulate and respectfully request the Court to stay   |  |
| 19     | proceedings in this case for a limited time, until April 28, 2025. The parties make this joint request  |  |
| 20     | because they are pursuing an administrative resolution that may render further litigation of this case  |  |
| 21     | unnecessary.  |  |
| 22     | Plaintiffs filed this mandamus action seeking adjudication of their Forms I-130, Petitions for  |  |
| 23     | Alien Relative, and Forms I-485, Application to Register Permanent Residence or Adjust Status. United   |  |
| 24     | States Citizenship and Immigration Services ("USCIS") adjudicated Plaintiffs' Form I-130 petitions.   |  |
| 25     | USCIS also scheduled an interview for February 27, 2025, on Plaintiffs' Form I-485 applications.  |  |
| 26     | Accordingly, the parties stipulate and request that the proceedings in this case be stayed until  |  |
| 27     | April 28, 2025, at which time the parties will file a joint status report with the Court. At that time, the   |  |
| 28     | Stipulation to Stay C 4:24-cv-08875 YGR   | I  |

| 1        | parties may request a further continuance of the stay of proceedings, dismissal of the litigation if      |  |
|----------|---|--|
| 2        | appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this    |  |
| 3        | case will benefit the parties and conserve the Court's resources while the parties pursue a potential     |  |
| 4        | administrative resolution.  |  |
| 5        | Dated: February 10, 2025 Respectfully submitted, <sup>1</sup>   |  |
| 6        | ISMAIL J. RAMSEY  |  |
| 7        | United States Attorney  |  |
| 8        | /s/ Elizabeth D. Kurlan ELIZABETH D. KURLAN Assistant United States Attorney                              |  |
| 10       | Attorneys for Defendants  |  |
| 11       | Dated: February 10, 2025  |  |
| 12       | /s/ Avantika Shastri<br>AVANTIKA SHASTRI  |  |
| 13       | Van Der Hout, LLP<br>Attorney for Plaintiffs  |  |
|          |   |  |
| 14<br>15 |   |  |
|          |   |  |
| 16       | <del>[PROPOSED]</del> ORDER   |  |
| 17       | Pursuant to stipulation, IT IS SO ORDERED. The Court sets a compliance deadline for May 2,                |  |
| 18       | 2025 at 9:01 a.m. By April 25, 2025, five business days before the deadline, parties shall submit a joint |  |
| 19       | statement updating the Court on the status of this case. The compliance deadline will be decided on the   |  |
| 20       | papers and personal appearances are not necessary. If compliance is complete, the compliance deadline     |  |
| 21       | will be vacated.  |  |
| 22       |   |  |
| 23       | Date: February 14, 2025  Date: February 14, 2025  |  |
| 24       | YVONNE GONZALEZ ROGERS United States District Judge   |  |
| 25       |   |  |
| 26       | In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all                |  |
| 27       | signatories listed herein concur in the filing of this document.  |  |
| 28       |   |  |

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